Methods

I) **252C Evanston)** The Joint Parties propose the allotment of channel 252C at Evanston, WY, at the permitted site of new Station 252C2 Evanston, WY (facility ID# 164152). The instant upgrade creates the following two short spacings: a) the reference coordinates of KARB channel 252C3 at Price, UT, is 55.34 kilometers short; and b) KIFX channel 253C2 Roosevelt, UT, is 55.26 kilometers short.

a) **KARB)** To eliminate the short space between the proposed allotment of channel 252C at Evanston, the Joint Parties propose the deletion of channel 252C3 and the substitution of channel 237C3 at the reference coordinates and application coordinates of KARB and channel 237A at the licensed coordinates of KARB. The instant substitution creates the following short spacing: the reference coordinates for 237C3 at Wellington, UT, are 142.35 kilometers short and the facility's new Construction Permit on channel 237A are 141.4 kilometers short.

i) **237C3 Wellington)** To eliminate the short space between (a) the proposed allotment of channel 237C3 at Price (KARB) and (b) the reference coordinates of 237C3 and permitted site of 237A at Wellington, the Joint Parties propose the deletion of channel 237C3 and the substitution of channel 233C3 for Wellington with a modified site at coordinates N39-30-41, W110-45-54. The instant substitution creates the following short spacing: the Vacant Allotment on channel 233C at Salina, UT, is 118.38 kilometers short.

(1) **ALLO 233C Salina)** To eliminate the short space between the proposed allotment of channel 233C3 at Wellington and the Vacant Allotment of 233C at Salina, UT, the Joint Parties propose the deletion of channel 233C and the substitution of channel 239C at a modified site for Salina at coordinates N38-50-58, W112-00-28. The instant substitution creates the following short spacing: KMGR 240C1 Delta, UT, is 110.28 kilometers short.

(a) **KMGR)** Presently KMGR operates on channel 240C1. To eliminate the short space between the proposed allotment of channel 239C at Salina and KMGR 240C1 at Delta, the Joint Parties propose to delete channel 240C1 from Delta and add

240C0 at Randolph, UT, for use by KMGR at coordinates N41-56-46, W111-00-04. The distance between the licensed site of KMGR and the proposed allotment site of channel 240C0 at Randolph is 0.2 kilometers short spaced. Therefore, the community of license change is MX. The proposed allotment creates two shortspaces: (i) KLZX 240C3 is 169.0 kilometers short; and (ii) the permitted site for KFMR 239C1 Marbleton, WY, is 138.24 kilometers short.

(i) **KLZX)** Presently KLZX is permitted to operate on channel 240C3. In order to eliminate the short spacing to channel 240C0 at Randolph (KMGR), the Joint Parties propose to substitute channel 260C3 for channel 240C3 at the permitted facility of KLZX. This creates short spacing to the following facilities: 1. KZDX channel 260C Burley, ID, is short by 79.32 kilometers; and 2. the permitted site for 261C2 at Soda Springs, ID, is 25.03 kilometers short.

1. **KZDX)** Presently KZDX operates on channel 260C. In order to eliminate the short spacing to channel 260C3 at Weston (KLZX), the Joint Parties propose to substitute channel 228C for channel 260C at a modified site for KZDX at coordinates N42-29-33, W113-44-44 . This creates short spacing to the following facility: KZBQ channel 239C Pocatello, ID, is short by 131.27 kilometers.

   a. **KZBQ)** Presently KZBQ operates on channel 229C. In order to eliminate the short spacing to channel 228C at Burley (KZDX), the Joint Parties propose to substitute channel 230C for channel 229C at the licensed site for KZBQ. This substitution requires no additional spectrum changes.

2. **KITT)** To eliminate the short space created by the proposed allotment of 260C3 at Weston (KLZX), the Joint Parties proposes to delete channel 261C2 at Soda Springs, ID, and allot channel 260C3 to Wilson, WY, as that community's first local service at coordinates N43-33-15, W110-51-38. Currently channel 261C2 at Soda Springs is used by KITT, and the Joint Parties request that its license be modified accordingly. The allotment of

channel 260C3 at Wilson is short to channel 261C2 at Soda Springs by 4.48 kilometers. Thus, the community of license change is MX. The allotment of KITT at Wilson is short spaced to one facility: NPRM 259C Meeteetse. **This is the MX point between the instant counterproposal and the NPRM.**

a. **NPRM 259C Meeteetse, WY)** To eliminate the short space between 260C3 at Wilson and the NPRM of channel 259C at Meeteetse, the Joint Parties propose the substitution of channel 288C for 259C with a slight site modification 9.51 kilometers southeast of the community at coordinates N44-05-55, W108-47-03. No other spectrum changes are necessary.

b. **KAOX)** Presently KAOX operates on channel 297C1. To eliminate the grey area that will be created upon the relocation of KITT from Soda Springs to Wilson, WY, the Joint Parties propose to delete channel 297C1 from Kemmerer and add 297C1 at Shelley, Idaho, for use by KAOX at coordinates N43-02-00, W111-55-34. The distance between the licensed site of KAOX and the proposed allotment site of channel 297C1 at Shelley is 67.5 kilometers short spaced. Therefore, the community of license change is MX. The proposed allotment creates one shortspace: KQEO 296C1 is 119.84 kilometers short.

   i. **KQEO)** Presently KQEO operates on channel 296C1 and has a pending Application to operate on channel 299C1. The Joint Parties propose to eliminate the short spacing between the allotment of channel 296C1 at Shelley and KQEO 296C1 at Idaho Falls by substituting channel 300C1 for 296C1 at Idaho Falls at coordinates N43-46-04, W111-57-57. This substitution is fully spaced to all other allotments, applications, and authorizations.

ii. **KCUA)** Presently KCUA is allocated to Naples, UT, on channel 223C3. In order to eliminate any white area that may be created as a result of relocating KAOX from Kemmerer to Shelley, the Joint Parties propose to delete channel 223C3 at Naples and allot channel 223C1 at Diamondville at coordinates N41-54-14, W110-31-06. The allotment of channel 223C1 at Diamondville is short to KCUA's licensed site at Naples by 43.96 kilometers. Thus, the community of license change is MX. This allotment creates one short space: KUUU 223C2 is 26.09 kilometers short. Finally, the deletion of channel 223C3 at Naples will deprive that community of its sole local aural service. Replacement service shall be provided by the following: b) KIFX Roosevelt.

A) **KUUU)** Presently KUUU operates on channel 223C2 at South Jordan. The allotment of channel 223C1 at Diamondville creates a short space to KUUU of 26.09 kilometers. The Joint Parties propose to eliminate the short spacing by downgrading KUUU to 223A and using a modified site with coordinates N40-27-11, W111-56-36. No additional spectrum changes are required to effect this change.

(ii) **KFMR)** Presently KFMR is permitted to operate on channel 239C1 at Marbleton, WY. To eliminate the short space to the substitution of channel 240C0 (KMGR) Randolph, UT, the Joint Parties propose to delete channel 239C1 from Marbleton and allocate channel 239C3 at Ballard, Utah, for use by KFMR at coordinates N40-27-04, W109-56-25. The distance between the permitted site of KFMR at Marbleton and the proposed allotment site of channel 239C3 at Ballard is 0.04 kilometers short spaced. Therefore, the community of license change is MX. The proposed allotment requires no additional spectrum changes.

1. **NEW 257C1 Marbleton)** The Joint Parties propose to add channel 257C1 at Marbleton, WY. The allotment of channel 257C1 at Marbleton at coordinates N42-19-28, W110-19-12, is fully spaced to all other facilities.

b) **KIFX)** Currently KIFX operates on channel 253C2 licensed to Roosevelt, UT. In order to replace service at Naples and eliminate the short space between the proposed allotment of 252C at Evanston and 253C2 (KIFX) Roosevelt, the Joint Parties propose to delete channel 253C2 at Roosevelt and allot channel 255C2 to Naples at coordinates N40-33-24, W109-38-08. The allotment of channel 255C2 at Naples is short to KIFX's licensed site at Roosevelt by 51.72 kilometers. Thus, the community of license change is MX. This allotment creates one short space: ALLO 255C3 Fruita, Colorado, is 16.32 kilometers short.

i) **ALLO 255C3 Fruita)** To eliminate the short space between the proposed allotment of channel 255C2 at Naples, UT (KIFX), and vacant channel 255C3 at Fruita, Colorado, the Joint Parties propose the deletion of channel 255C3 and the substitution of channel 255A at modified site at coordinates N39-12-16, W108-49-12. No additional spectrum changes are needed.

Exhibits Explained.

Channel 252C Evanston, WY

Exhibit E, Figure 1 is an allocation study showing the spacings to other stations if channel 252C is allocated to Evanston, WY. The only short spacings shown are KARB 252C3 in Price, UT, and KIFX 253C2 Roosevelt, UT. Exhibit E, Figure 2 shows the proposed city-grade contour for channel 252C from the proposed site. The city-grade contour easily covers 100% of Evanston, WY. Exhibit E, Figure 3 is a gain study that demonstrates the proposed areas that channel 252C will now cover as a result of the proposed upgrade from 252C2.

Channel 237C3 Price, UT

In order to allocate channel 252C at Evanston, the short spacing with Channel 252C3 (KARB) in Price, UT, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 237C3 for channel 252C3 at Price with no site change needed. Exhibit E, Figure 4 is an allocation study showing the proposed short spacing one facility: the reference coordinates for 237C3 and permitted coordinates for 237A at Wellington, UT.

Channel 233C3 Wellington, UT

In order to allocate channel 237C3 at Price, the short spacing with Channel 237C3 (and the CP for 237A) at Wellington, UT, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 233C3 for channel 237C3 at Wellington with a site modification (note: 233A may be substituted at the permitted site for 237A). Exhibit E, Figure 5 is an allocation study showing the proposed short spacing one facility: Vacant Allotment 233C at Salina, UT. Exhibit E, Figure 6 shows the proposed city-grade contour for channel 233C3 from the proposed site. The city-grade contour easily covers 100% of Wellington, UT. Exhibit E, Figure 7 is a gain/loss study that demonstrates the proposed areas that channel 233C3 will cover and that 237C3 will no longer cover as a result of the proposed relocation.

Channel 239C Salina, UT

In order to allocate channel 233C3 at Wellington, the short spacing with the Vacant Allotment of Channel 233C at Salina, UT, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 239C for channel 233C at Salina with a site modification. Exhibit E, Figure 8 is

an allocation study showing the proposed short spacing one facility: KMGR 240C1 Delta, UT. Exhibit E, Figure 9 shows the proposed city-grade contour for channel 239C from the proposed site. The city-grade contour easily covers 100% of Salina, UT. Exhibit E, Figure 10 is a gain/loss study that demonstrates the proposed areas that channel 239C will cover and that 233C will no longer cover as a result of the proposed relocation.

Channel 240C Randolph, UT

In order to allocate channel 239C at Salina, the short spacing with the licensed site for channel 240C1 KMGR Delta, UT, must be eliminated. In order to alleviate this short spacing, it is proposed to delete channel 240C1 at Delta and add channel 240C0 at Randolph, UT, for use by KMGR with a site modification. Exhibit E, Figure 11 is an allocation study showing the proposed short spacing two facilities: KLZX 240C3 Weston, ID, and the CP site for 239C1 Marbleton, WY. Exhibit E, Figure 12 shows the proposed city-grade contour for channel 240C0 from the proposed site. The city-grade contour easily covers 100% of Randolph, UT. Exhibit E, Figure 13 is a gain/loss study that demonstrates the proposed areas that channel 240C0 will cover and that 240C1 will no longer cover as a result of the proposed relocation. Exhibit E, Figure 14 is a remaining services study showing the services that will continue to serve the loss area after channel 240C1 is deleted from Delta. It should be noted that the deletion of 240C1 from Delta will result in that community still retaining at least one local aural service: KNAK 540 kHz.

Channel 260C3 Weston, ID

In order to allocate channel 240C0 at Randolph (KMGR), the short spacing with channel 240C3 (KLZX) in Weston, ID, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 260C3 for channel 240C3 at Weston with no site change needed. Exhibit E, Figure 15 is an allocation study showing the proposed short spacing two facilities: KZDX 260C in Burley, ID, and KITT 261C2 Soda Springs, ID.

Channel 228C Burley, ID

In order to allocate channel 240C3 at Weston, the short spacing with KZDX 260C Burley, ID, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 228C for channel 260C at Burley with a site modification. Exhibit E, Figure 16 is an allocation study showing the proposed short spacing one facility: KZBQ 229C at Pocatello, ID. Exhibit E, Figure 17 shows the

proposed city-grade contour for channel 228C from the proposed site. The city-grade contour easily covers 100% of Burley, ID. Exhibit E, Figure 18 is a gain/loss study that demonstrates the proposed areas that channel 228C will cover and that 260C will no longer cover as a result of the proposed relocation.

Channel 230C Pocatello, ID

In order to allocate channel 228C at Burley (KZDX), the short spacing with channel 229C (KZBQ) in Pocatello, ID, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 230 for channel 229C at Pocatello with no site change needed. Exhibit E, Figure 19 is an allocation study showing the proposed short spacing no other facilities.

Channel 260C3 Wilson, WY

In order to allocate channel 260C3 at Weston, ID, the short spacing with channel 261C2 (KITT) in Soda Springs, ID, must be eliminated. In order to alleviate this short spacing, it is proposed to delete channel 261C2 at Soda Springs and allocate channel 260C3 at Wilson, WY, as that community's first local aural service. Exhibit E, Figure 20 is an allocation study showing the proposed short spacing one new facility: the NPRM to add channel 259C at Meeteetse, WY. **This is the point at which the instant counter proposal becomes mutually exclusive with the petition for rulemaking in MB Docket 05-243.** Exhibit E, Figure 21 shows the proposed city-grade contour for channel 260C3 from the proposed site. The city-grade contour easily covers 100% of Wilson, WY. Exhibit E, Figure 22 is a gain/loss study that demonstrates the proposed areas that channel 260C3 will cover at Wilson and that 261C2 will no longer cover at Soda Springs as a result of the proposed relocation and downgrade. Exhibit E, Figure 23 is a remaining services study showing that no white area is being created. However, some grey area will be created as a result of the relocation. Even though adding first aural reception service to 6 persons elsewhere in this proposal (at 288C Meeteetse) is preferred by the Commission's allotment priorities at the expense of creating grey area, the Joint Parties propose that second aural service can still be maintained in this area by relocating KAOX 297C1 from Kemmerer, WY, to Shelley, ID, as discussed later in this proposal. The remaining service study assumes that KAOX has relocated to Shelley.

Channel 259C Meeteetse, WY

In order to allocate channel 260C3 at Wilson, the short spacing with the NPRM to add channel 259C at Meeteetse, WY, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 288C for 259C and move the allotment coordinates to a new site. Exhibit E, Figure 24 is an allocation study showing the proposed change short spacing no other facilities. Exhibit E, Figure 25 shows the proposed city-grade contour for channel 288C from the proposed site. The city-grade contour easily covers 100% of Meeteetse with complete line of sight. Exhibit E, Figure 26 is a gain/loss study that demonstrates the proposed areas that channel 288C will cover and that 259C will no longer cover as a result of the proposed relocation and downgrade. It should be noted that, from the proposed 288C site, first aural reception service is created for 6 persons over a section of US Highways 26 and 287. In addition, second aural reception service is created for 83 persons.

Channel 297C1 Shelley, ID

In order to move KITT from 261C2 Soda Springs to 260C3 Wilson, the grey area which will be created around Soda Springs upon KITT's exit can be eliminated. In order to continue serving this area with its second aural service, it is proposed to delete channel 297C1 at Kemmerer and allocate channel 296C1 at Shelley, Idaho. Exhibit E, Figure 27 is an allocation study showing the proposed short spacing one facility: KQEO 296C1 Idaho Falls. Exhibit E, Figure 28 shows the proposed city-grade contour for channel 296C1 from the proposed site. The city-grade contour easily covers 100% of Shelley, ID, with line of sight to the entire community. Exhibit E, Figure 29 is a gain/loss study that demonstrates the proposed areas that channel 297C1 will cover and that 297C1 will no longer cover as a result of the proposed relocation. Exhibit E, Figure 30 is a remaining services study showing the services that will continue to serve the loss area after channel 297C1 is deleted from Kemmerer. It should be noted that no white area will be created since, in this proposal, KCUA channel 223C1 will be allotted at Diamondville, WY, and will replace service in areas that would otherwise become unserved as a result of the relocation of KAOX. No grey area is being created as a result of this relocation. In the remaining services study, the KCUA relocation to Diamondville is assumed.

Channel 300C1 Idaho Falls, ID

In order to allocate channel 296C1 at Shelley, the short spacing with channel 296C1 (KQEO) in Idaho Falls, ID, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute

channel 300C1 for channel 296C1 at Idaho Falls at a modified site. Exhibit E, Figure 31 is an allocation study showing the proposed short spacing no other facilities. Exhibit E, Figure 32 shows the proposed city-grade contour for channel 300C1 from the proposed site. The city-grade contour easily covers 100% of Idaho Falls, ID, with line of sight to the entire community. Exhibit E, Figure 33 is a gain/loss study that demonstrates the proposed areas that channel 300C1 will cover and 296C1 will no longer cover as a result of the proposed relocation.

Channel 223C1 Diamondville, WY

In order to replace the loss of Diamondville's only local aural service, it is proposed that KCUA channel 223C3 Naples, UT, be deleted from Naples, UT, and be added at Diamondville, WY, on channel 223C1. Exhibit E, Figure 34 is an allocation study showing the proposed short spacing one facility: KUUU channel 223C2 in South Jordan, UT. Exhibit E, Figure 35 shows the proposed city-grade contour for channel 223C1 from the proposed site. The city-grade contour easily covers 100% of Diamondville, WY, with complete line of sight. Exhibit E, Figure 36 is a gain/loss study that demonstrates the proposed areas that channel 223C1 will cover and the areas 223C3 will no longer cover as a result of the proposed relocation. Exhibit E, Figure 37 is a remaining services study showing the services that will continue to serve the loss area after channel 223C3 is deleted from Naples. It should be noted that the deletion of 223C3 from Naples will result in that community losing its only local aural service. Replacement service at Naples shall be provided by KIFX on channel 253C2 and shall be discussed in later exhibits.

Channel 223A South Jordan, UT

In order to allocate channel 223C1 at Diamondville and channel 223C3 at Wellington, the short spacing with channel 223C2 (KUUU) in South Jordan, UT, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 223A for channel 223C2 at South Jordan and modify the site location. Exhibit E, Figure 38 is an allocation study showing the proposed short spacing no facilities. Exhibit E, Figure 39 shows the proposed city-grade contour for channel 223A from the proposed site. The city-grade contour easily covers 100% of South Jordan, UT. Exhibit E, Figure 40 is a gain/loss study that demonstrates the proposed areas that channel 223A will cover and that 223C2 will no longer cover as a result of the proposed relocation.

Channel 239C3 Ballard, UT

In order to allocate channel 240C0 (KMGR) at Randolph, UT, the shortspace with KFMR 239C1 at Marbleton, WY must be eliminated. The Joint Parties propose to delete channel 239C1 at Marbleton and allocate channel 239C3 at Ballard, Utah, as that community's first local service. Exhibit E, Figure 41 is an allocation study showing the proposed short spacing no other facilities. Exhibit E, Figure 42 shows the proposed city-grade contour for channel 239C3 from the proposed site. The city-grade contour easily covers 100% of Ballard, UT, with line of sight to the entire community. Exhibit E, Figure 43 is a gain/loss study that demonstrates the proposed areas that channel 239C3 will cover and that 239C1 will no longer cover as a result of the proposed relocation.

Channel 257C1 Marbleton, WY

Exhibit E, Figure 44 is an allocation study showing the spacings to other stations if channel 257C1 is allocated Marbleton, WY, as new service. Such an allocation would be fully spaced to all other facilities. Exhibit E, Figure 45 shows the proposed city-grade contour for channel 257C1 from the proposed site. The city-grade contour easily covers 100% of Marbleton, WY. Exhibit E, Figure 46 is a gain study that demonstrates the proposed areas that channel 257C1 will cover as a result of the proposed allocation.

Channel 255C2 Naples, UT

To replace the loss of Naples' only local aural service and to eliminate the short space between the proposed allotment of 252C at Evanston and KIFX 253C2 at Roosevelt, it is proposed that channel 253C2 Roosevelt, UT, be deleted and that MX channel 255C2 be added at Naples, UT. Exhibit E, Figure 47 is an allocation study showing the proposed short spacing one facility: ALLO 255C3 Fruita, Colorado. Exhibit E, Figure 48 shows the proposed city-grade contour for channel 253C2 from the proposed site. The city-grade contour easily covers 100% of Naples, UT. Exhibit E, Figure 49 is a gain/loss study that demonstrates the proposed areas that channel 255C2 will cover and 253C2 will no longer cover as a result of the proposed relocation. Exhibit E, Figure 50 is a remaining services study showing the services that will continue to serve the loss area after channel 253C2 is deleted from Roosevelt. It should be noted that the deletion of 253C2 from Roosevelt will result in that community retaining two local aural services – KNEU (AM) 1250 kHz and KXRQ (FM) 232C1.

Channel 268C3 Fruita, CO

In order to allocate channel 255C2 at Naples, the short spacing with the Vacant Allotment on channel 255C3 at Fruita, CO, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 255A for channel 255C3 at Fruita and modify the site location. Exhibit E, Figure 51 is an allocation study showing the proposed short spacing no facilities. Exhibit E, Figure 52 shows the proposed city-grade contour for channel 255A from the proposed site. The city-grade contour easily covers 100% of Fruita, CO. Exhibit E, Figure 53 is a gain/loss study that demonstrates the proposed areas that channel 255A will cover and that 255C3 will no longer cover as a result of the proposed relocation.

Conclusion

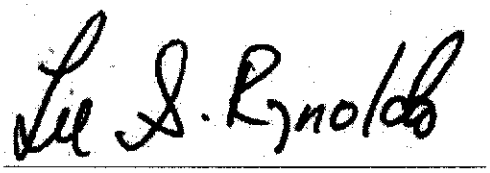
The Joint Parties' counterproposal has demonstrated that it is in technical compliance with the present Commission Rules concerning such actions. The counterproposal produces new first aural service to 6 persons and second aural service to 83 persons in west central Wyoming. It also produces a new first local service to three communities (Ballard, Utah; Wilson, WY; and Meeteetse, WY), and a new second local service at two communities (Shelley, ID, and Randolph, Utah). The counterproposal creates a net increase in new 60-dBu service of 61,036 square kilometers, and it provides a new 60 dBu service to 233,238 persons.

Statement of the Consultants

The instant engineering portion of a counterproposal was prepared for the Joint Parties and supports a counterproposal to MM Docket 05-243. It was developed by Reynolds Technical Associates, LLC ("RTA") and may not be used for purposes other than submission to the Commission by the Joint Parties. It may not be reproduced in its entirety, or in part, by anyone (other than from the Commission) without the written consent of RTA.

The information in this application is compiled from the most recent Commission and outside data. RTA is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

For Reynolds Technical Associates, LLC:



Lee S. Reynolds
September 19, 2005

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ENGINEERING STATEMENT

In Support of a

Counterproposal

MB Docket 05-243

Summary of Channel Assignments

(Depicting all communities, channels, and modifications)

COMMUNITY	PRESENT	PROPOSED	COMMENTS
Evanston, WY	***252C2, 291C, KEVA-AM 1240 kHz***	***252C, 291C, KEVA-AM 1240 kHz***	Delete channel 252C2 at Evanston and allocate channel 252C at Evanston at the current permitted site for the new station with FCC Facility ID# 164152.
Price, UT	**252C3, 261A**	***237C3, 261A***	Delete channel 252C3 at Price and allocate channel 237C3 at Price at the current site for KARB.
Wellington, UT	***237C3 (237A CP)***	***233C3 (233A CP)***	Delete channel 237C3 at Wellington and allocate channel 233C3 at Wellington at a modified site for the new station with FCC Facility ID#164148.
Salina, UT	**233C**	***239C***	Delete channel 233C at Salina and allocate channel 239C at Salina at a modified site for the Vacant Allotment at Salina.
Randolph, UT	**272C**	**272C, 240C0**	Delete channel 240C1 at Delta, Utah, and allocate channel 240C0 at Randolph, Utah, for use by KMGR. The allocation of 240C0 will provide second local service to Randolph with a population of 483 according to the 2000 US Census.
Delta, UT	***295C, KXOL-AM 1660 kHz, 240C1***	**KXOL-AM 1660 kHz**	Channel 240C1 will be deleted at Delta and channel 240C0 allocated at Randolph. Delta will continue to receive service from KNAK-AM, 540 kHz.
Weston, ID	**240C3**	***260C3***	Delete channel 240C3 at Weston and allocate channel 260C3 at Weston at the permitted site for KLZX.
Burley, ID	**260C**	***228C***	Delete channel 260C at Burley and allocate channel 228C at Burley at a modified site for KZDX.
Pocatello, ID	**221C2, 229C, 235C, 273C**	***221C2, 230C, 235C, 273C***	Delete channel 229C at Pocatello and allocate channel 230C at Pocatello at the licensed site for KZBQ.
Wilson, WY	———	**260C3**	Delete channel 261C2 at Soda Springs, ID, and allocate channel 260C3 at Wilson, WY, for use by KITT. The allocation of 260C3 will provide first local service to Wilson with a population of 1,294 according to the 2000 US Census.
Soda Springs, ID	***261C2, KBRV-AM 790 kHz***	**KBRV-AM 790 kHz**	Channel 261C2 will be deleted at Soda Springs and channel 260C3 allocated at Wilson. Soda Springs will continue to receive service from KBRV-AM, 790 kHz.
Meeteetse, WY	***273C, 259C(proposed)***	***288C***	Errant Channel 273C will be deleted at Meeteetse and channel 288C will be allocated at Meeteetse at a new site instead of channel 259C proposed by the Commission.
Shelley, ID	***292C1***	**292C1, 297C1**	When KITT exits Soda Springs en route for Wilson, areas around Soda Springs will need replacement service to prevent grey area from being created. To replace service, it is proposed to delete channel 297C1 at Kemmerer, WY, and allocate channel 297C1 at Shelley, ID, for use by KAOX. The allocation of 296C1 will provide second local service to Shelley with a population of 3,813 according to the 2000 US Census.
Kemmerer, WY	***297C1, KMER-AM 950 kHz***	**KMER-AM 950 kHz**	Delete channel 297C1 at Kemmerer and allocate channel 297C1 at Shelley, ID. Kemmerer will continue to receive service from KMER 950 kHz.

Table 1 (continued)

COMMUNITY	PRESENT	PROPOSED	COMMENTS
Idaho Falls, ID	***241C, 256C1, 277C1, 288C1, 296C1***	***241C, 256C1, 277C1, 288C1, 300C1***	Delete channel 296C1 at Idaho Falls and allocate channel 300C1 at Idaho Falls at a new site for KQEO.
Diamondville, WY	***287C2***	***287C2, 223C1***	When KAOX exits Kemmerer en route for Shelley, areas around Kemmerer will need replacement service to prevent white area from being created. To replace service, it is proposed to delete channel 223C3 at Naples, UT, used by KCUA, and add MX channel 223C1 at Diamondville for use by KCUA.
South Jordan, UT	***223C2***	***223A***	Delete channel 223C2 at South Jordan and allocate channel 223A at South Jordan at a new site for use by KUUU.
Ballard, UT	———	**239C3**	Delete channel 239C1 at Marbleton, WY, and allocate channel 239C3 at Ballard, UT, for use by KFMR. The allocation of 260C3 will provide first local service to Ballard with a population of 566 according to the 2000 US Census.
Marbleton, WY	***239C1***	**257C1**	Delete channel 239C1 at Marbleton and allocate channel 239C3 at Ballard. Additional new service at Marbleton will be added through the allotment of 257C1.
Naples, UT	***223C3***	***255C2***	When KCUA exits Naples en route for Diamondville, Naples will need replacement service. This shall be provided by KIFX which currently operates on channel 253C2 at Roosevelt, UT. Channel 253C2 will be deleted at Roosevelt and MX channel 255C2 will be allocated to Naples for use by KIFX.
Roosevelt, UT	***232C1, 253C2, KNEU-AM***	***232C1, KNEU-AM***	Channel 253C2 will be deleted at Roosevelt and channel 255C2 allocated at Naples. Roosevelt will continue to receive service from KXRQ (FM) 232C1 and KNEU-AM, 1250 kHz.
Fruita, CO	***255C3, 260C***	***260C, 268C3***	Delete vacant allotment channel 255C3 at Fruita and allocate channel 268C3 at Fruita at a new site.

Engineering Statement
In Support of a Counterproposal

Channel 252C, Evanston, WY Allocation Study

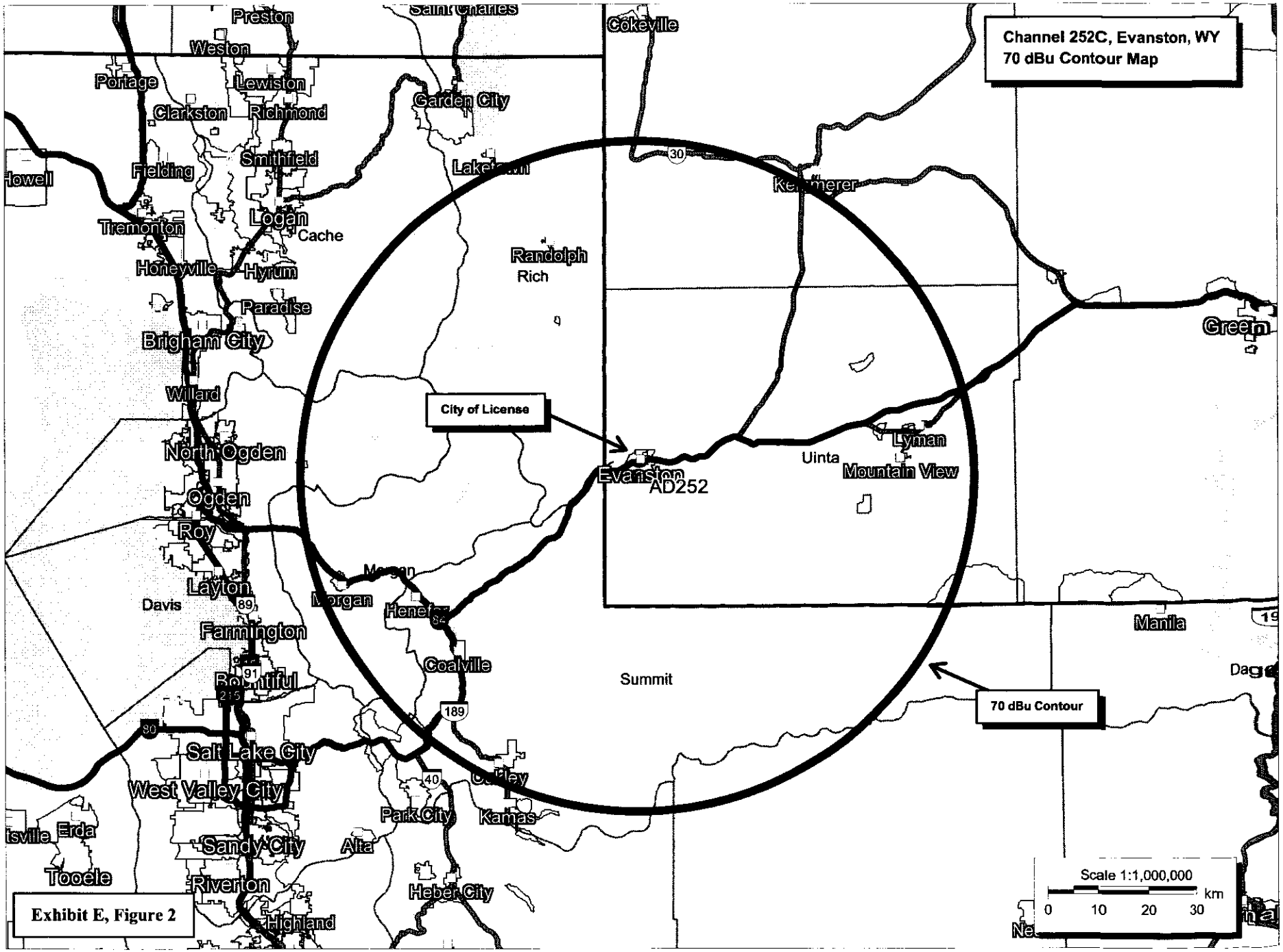
REFERENCE
41 14 14 N
110 58 09 W

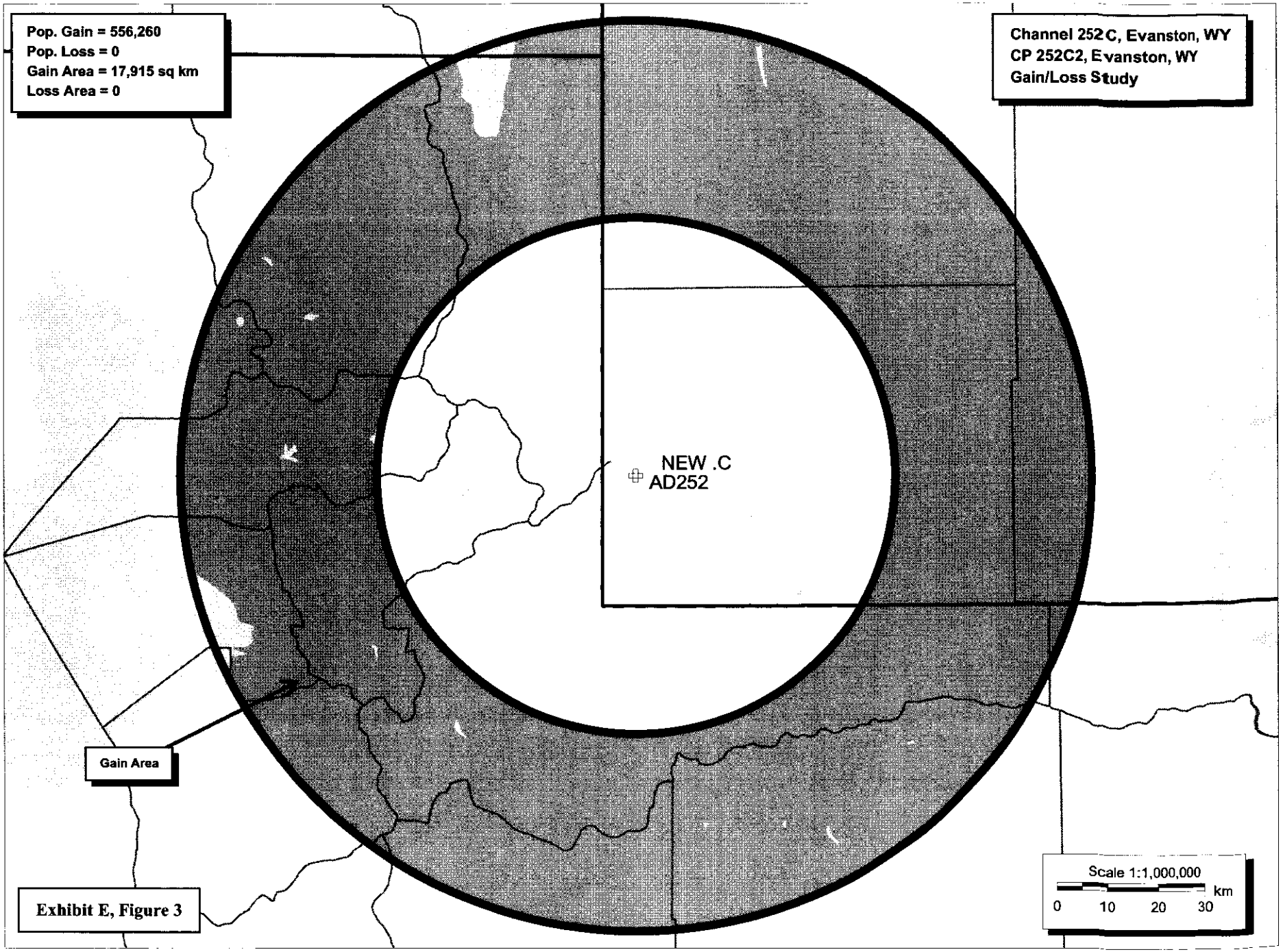
CLASS = C
Current Spacings
Channel 252 - 98.3 MHz

DISPLAY DATES
DATA 09-13-05
SEARCH 09-16-05

Call	Channel	Location		Dist	Azi	FCC	Margin
NEW .C	**CP 252C2**	**Evanston**	**WY**	**0.00**	**0.0**	**249.0**	**-249.00**
VA252	**VAC 252C2**	**Evanston**	**WY**	**3.31**	**8.5**	**249.0**	**-245.69**
	Of no concern:						
	Coordinates used by channel 252C2 at Evanston, WY						
KIFX	**LIC 253C2**	**Roosevelt**	**UT**	**132.25**	**125.7**	**188.0**	**-55.75**
	Of concern:						
	KIFX changes to channel 255C2 at Naples, UT in instant counterproposal (see below).						
KARB.A	**APP 252C3**	**Price**	**UT**	**181.26**	**175.8**	**237.0**	**-55.74**
KARB	**RSV 252C3**	**Price**	**UT**	**181.26**	**175.8**	**237.0**	**-55.74**
KARB	**LIC 252A**	**Price**	**UT**	**181.16**	**175.8**	**226.0**	**-44.84**
	Of concern:						
	KARB moves to channel 237C3 in the instant counterproposal.						
RADD	**ADD 253C2**	**Naples**	**UT**	**158.43**	**116.2**	**188.0**	**-29.57**
	Of no concern:						
	This proposed substitution was dismissed in MM Docket 04-427.						
KBZN	LIC 250C	Ogden	UT	121.98	238.6	105.0	16.98
KBEE	LIC 254C	Salt Lake City	UT	122.19	235.4	105.0	17.19
AL255	RSV 255C3	Franklin	ID	124.87	326.3	96.0	28.87
KLLP.C	CP 253C2	Chubbuck	ID	218.96	329.2	188.0	30.96
KLLP	LIC 253C2	Chubbuck	ID	218.96	329.2	188.0	30.96
KZWB	LIC 250C2	Green River	WY	138.86	77.5	105.0	33.86
KLLP.A	APP-N 253C2	Chubbuck	ID	222.22	325.5	188.0	34.22
AD255	**PRO 255C2**	**Naples**	**UT**	**139.45**	**124.3**	**105.0**	**34.45**
	Of note:						
	Proposed allocation coordinates for channel KIFX in the instant counterproposal.						
KAYW	LIC 251C	Meeker	CO	285.00	118.7	241.0	44.00

Exhibit E, Figure 1


Channel 252C, Evanston, WY
70 dBu Contour Map
City of License
AD252
70 dBu Contour
Scale 1:1,000,000
km
0 10 20 30
Exhibit E, Figure 2
Preston
Weston
Portage
Lewiston
Clarkston
Richmond
Garden City
Smithfield
Fielding
Howell
Logan
Cache
Tremonton
Honeyville
Hyrum
Paradise
Brigham City
Willard
North Ogden
Ogden
Roy
Layton
Davis
Farmington
Bountiful
Salt Lake City
West Valley City
Tooele
Riverton
Sandy City
Alta
Park City
Kamas
Heber City
Coalville
Morgan
Summit
Randolph
Rich
Cokeville
Kemmerer
Green
Uinta
Lyman
Mountain View
Evanston
Manila


Pop. Gain = 556,260
Pop. Loss = 0
Gain Area = 17,915 sq km
Loss Area = 0
Channel 252C, Evanston, WY
CP 252C2, Evanston, WY
Gain/Loss Study
NEW .C
AD252
Gain Area
Scale 1:1,000,000
km
0
10
20
30
Exhibit E, Figure 3

Engineering Statement
In Support of a Counterproposal

Channel 237C3 (KARB), Price, UT Allocation Study

REFERENCE
39 36 33 N
110 48 50 W

CLASS = C3
Current Spacings
Channel 237 - 95.3 MHz

DISPLAY DATES
DATA 09-13-05
SEARCH 09-16-05

Call	Channel		Location		Dist	Azi	FCC	Margin
RADD	**ADD**	**237C2**	**Huntington**	**UT**	**10.05**	**137.5**	**177.0**	**-166.95**
RADD	**ADD**	**237C2**	**Huntington**	**UT**	**33.92**	**202.3**	**177.0**	**-143.08**
Of no concern:								
Channel has moved to channel 296C2.								
AL237	**VAC**	**237C3**	**Wellington**	**UT**	**10.05**	**137.5**	**153.0**	**-142.95**
NEW .C	**CP**	**237A**	**Wellington**	**UT**	**0.00**	**0.0**	**142.0**	**-142.00**
Of concern:								
Channel moves to channel 233C3 in the instant counterproposal.								
RADD	**ADD**	**237C2**	**Huntington**	**UT**	**52.56**	**212.5**	**177.0**	**-124.44**
Of no concern:								
Channel has moved to channel 296C2.								
KMGR	**LIC**	**240C1**	**Delta**	**UT**	**97.83**	**278.5**	**76.0**	**21.83**
Of note:								
Channel 240C1 at Delta is deleted and channel 240C0 is allocated at Randolph, UT for use by KMGR in the instant counterproposal.								
KHTB	LIC	235C	Provo	UT	121.64	308.4	96.0	25.64
AD239	**PRO**	**239C**	**Salina**	**UT**	**121.73**	**228.1**	**96.0**	**25.73**
Of note:								
Channel 239C is substituted for channel 233C at Salina, UT in the instant counterproposal.								

Exhibit E, Figure 4

Engineering Statement
In Support of a Counterproposal

Channel 233C3, Wellington, UT Allocation Study

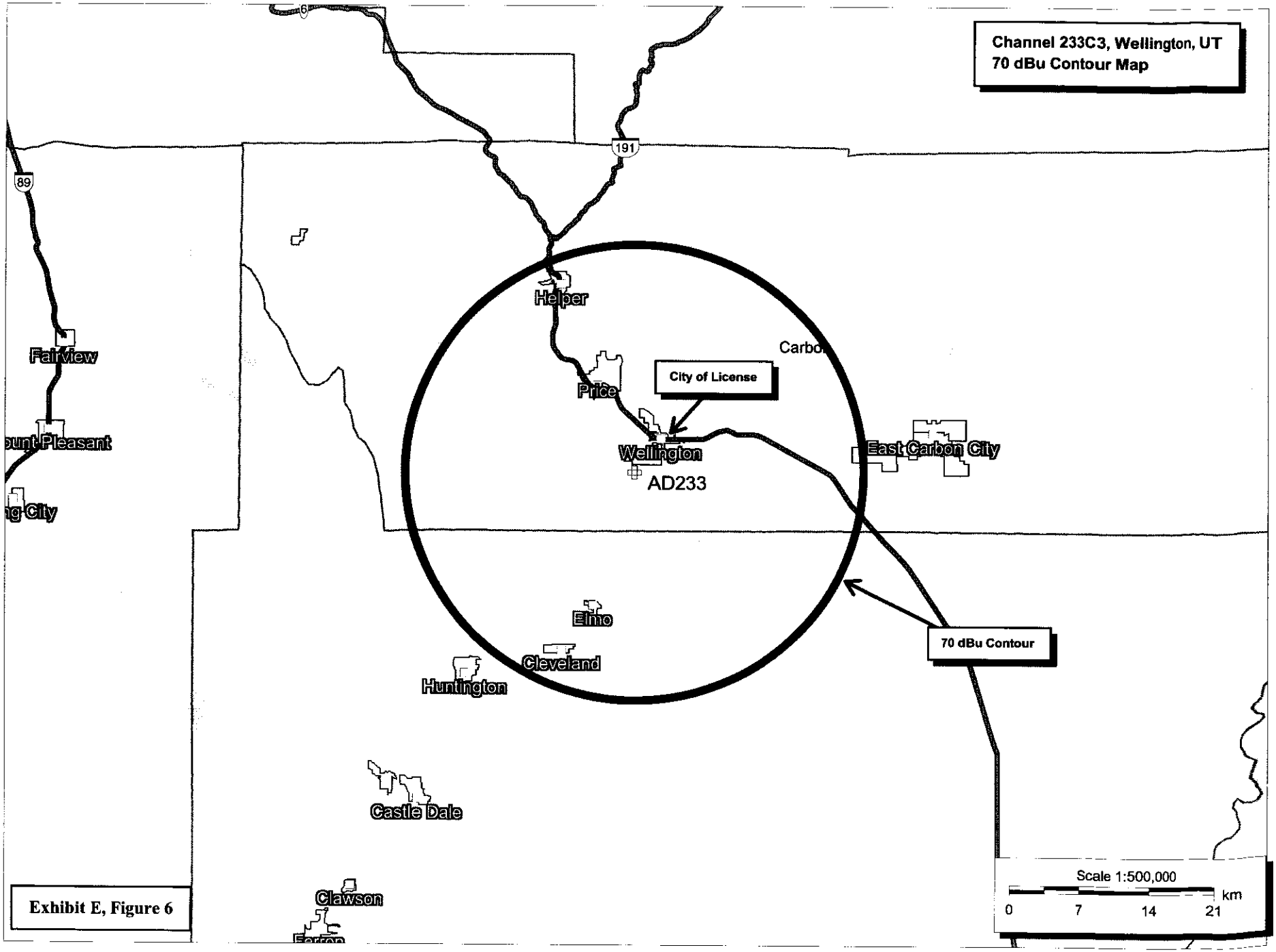
REFERENCE
39 30 41 N
110 45 54 W

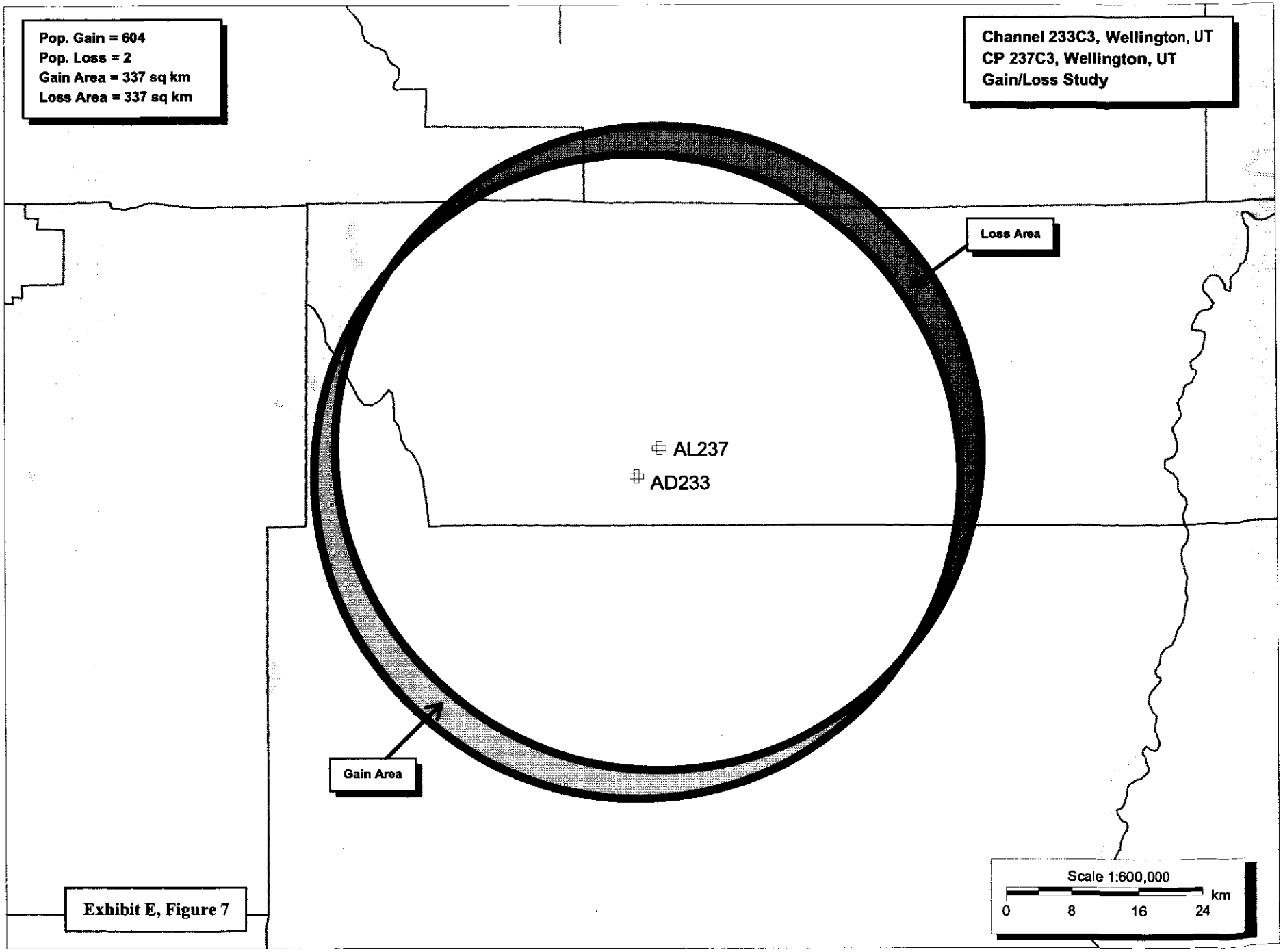
CLASS = C3
Current Spacings
Channel 233 - 94.5 MHz

DISPLAY DATES
DATA 09-13-05
SEARCH 09-16-05

Call	Channel		Location		Dist	Azi	FCC	Margin
AL233	**VAC**	**233C**	**Salina**	**UT**	**118.12**	**233.4**	**237.0**	**-118.88**
Of concern: Channel 239C substituted for channel 233C at Salina, UT in the instant counterproposal.								
KXRQ	LIC-Z	232C1	Roosevelt	UT	143.95	38.4	144.0	-0.05
KXRQ.C	CP	234C2	Roosevelt	UT	128.34	44.3	117.0	11.34
KHTB	LIC	235C	Provo	UT	131.80	311.0	96.0	35.80
RDEL	DEL	286C	Manti	UT	75.00	292.0	31.0	44.00
KNJQ	LIC-N	286C	Manti	UT	75.00	292.0	31.0	44.00
KVFX	LIC	233C	Logan	UT	283.56	339.6	237.0	46.56

Exhibit E, Figure 5


Channel 233C3, Wellington, UT
70 dBu Contour Map
191
89
Helper
Fairview
Carbon
City of License
Price
Wellington
AD233
East Carbon City
Elmo
Cleveland
Huntington
70 dBu Contour
Castle Dale
Clawson
Scale 1:500,000
km
0
7
14
21
Exhibit E, Figure 6


Pop. Gain = 604
Pop. Loss = 2
Gain Area = 337 sq km
Loss Area = 337 sq km
Channel 233C3, Wellington, UT
CP 237C3, Wellington, UT
Gain/Loss Study
Loss Area
AL237
AD233
Gain Area
Scale 1:600,000
km
0
8
16
24
Exhibit E, Figure 7

Engineering Statement
In Support of a Counterproposal

Channel 239C, Salina, UT Allocation Study

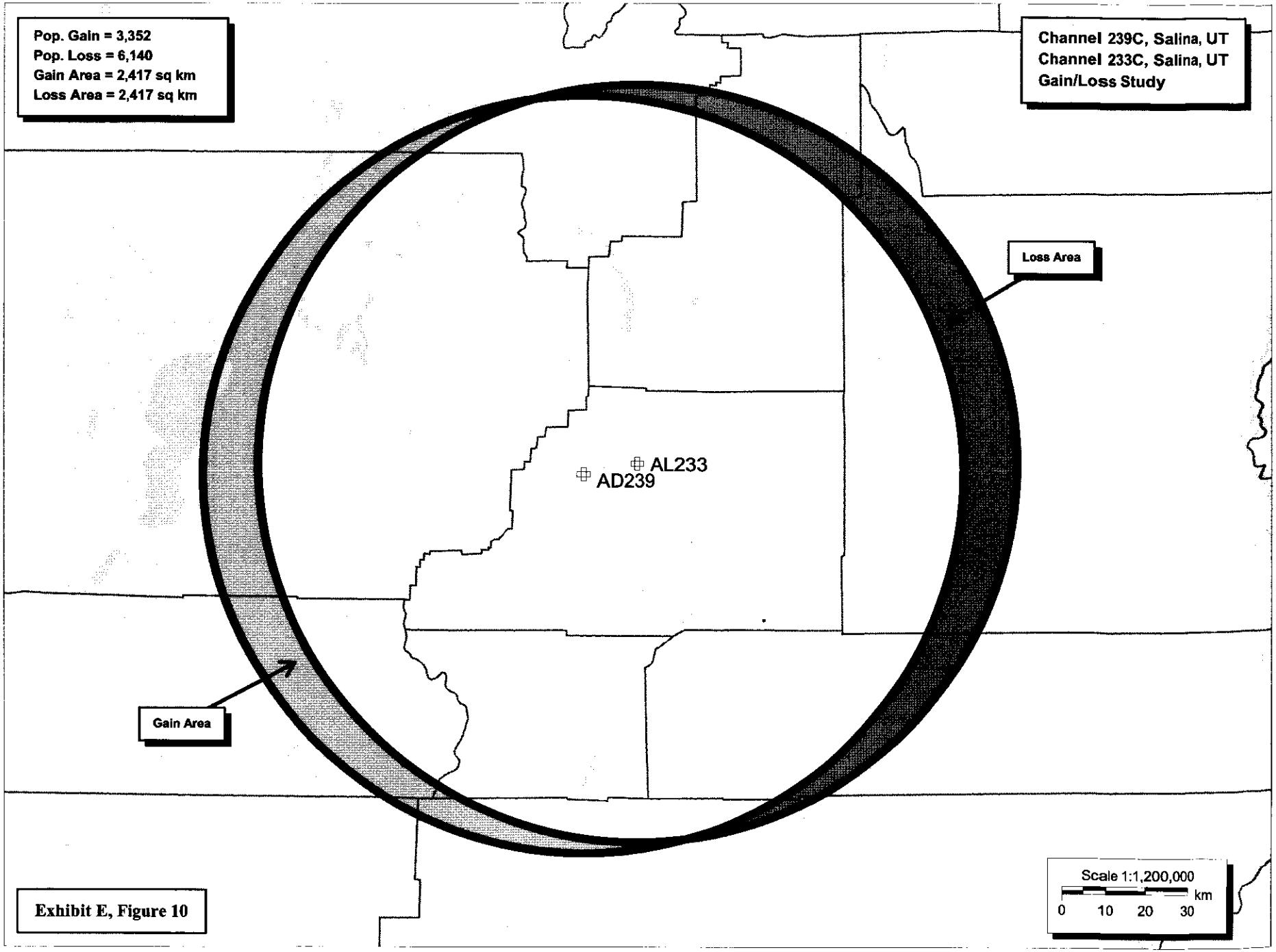
REFERENCE
38 50 58 N
112 00 28 W

CLASS = C
Current Spacings
Channel 239 - 95.7 MHz

DISPLAY DATES
DATA 09-13-05
SEARCH 09-16-05

Call		Channel	Location		Dist	Azi	FCC	Margin
KMGR	**LIC**	**240C1**	**Delta**	**UT**	**98.23**	**3.2**	**209.0**	**-110.77**
	Of concern: Channel 240C1 deleted at Delta, UT and allocated at Randolph, UT on channel 240C0.							
RADD	**ADD**	**237C2**	**Huntington**	**UT**	**85.02**	**61.6**	**105.0**	**-19.98**
RADD	**ADD**	**237C2**	**Huntington**	**UT**	**104.71**	**59.2**	**105.0**	**-0.29**
	Of no concern: This channel has been deleted and re-allotted to channel 296C2 at Huntington, UT.							
AD239	**PRO**	**239C3**	**Ballard**	**UT**	**251.22**	**44.2**	**237.0**	**14.22**
	Of note: Proposed facility for KFMR, channel 239C1 at Marbleton, WY in the instant counterproposal.							
KZHK	LIC	240C	St. George	UT	257.77	210.8	241.0	16.77
AD237	**PRO**	**237C3**	**Price**	**UT**	**133.20**	**50.2**	**96.0**	**37.20**
	Of note: Proposed substitute channel for KARB in the instant counterproposal.							
AL237	VAC	237C3	Wellington	UT	133.20	50.2	95.0	38.20
NEW .C	CP	237A	Wellington	UT	134.22	54.5	96.0	38.22

Exhibit E, Figure 8


Pop. Gain = 3,352
Pop. Loss = 6,140
Gain Area = 2,417 sq km
Loss Area = 2,417 sq km
Channel 239C, Salina, UT
Channel 233C, Salina, UT
Gain/Loss Study
Loss Area
AL233
AD239
Gain Area
Scale 1:1,200,000
km
0 10 20 30
Exhibit E, Figure 10

Engineering Statement
In Support of a Counterproposal

Channel 240C0 (KMGR), Randolph, UT Allocation Study

REFERENCE
41 56 46 N
111 00 04 W

CLASS = C0
Current Spacings
Channel 240 - 95.9 MHz

DISPLAY DATES
DATA 09-13-05
SEARCH 09-16-05

Call	Channel	Location		Dist	Azi	FCC	Margin
KLZX.C	**CP 240C3**	**Weston**	**ID**	**67.51**	**263.2**	**226.0**	**-158.49**
KLZX	**LIC 240A**	**Weston**	**ID**	**79.80**	**266.4**	**215.0**	**-135.20**
	Of concern: KLZX moves to channel 260C3 at the current CP site in the instant counterproposal.						
KFMR.C	**CP -Z 239C1**	**Marbleton**	**WY**	**70.26**	**52.9**	**196.0**	**-125.74**
AL239	**VAC 239A**	**Marbleton**	**WY**	**100.74**	**47.2**	**152.0**	**-51.26**
	Of concern: Channel 239C1 at Marbleton, WY moves to channel 239C3 at Ballard, UT in the instant counterproposal (see below).						
KMGR	**LIC 240C1**	**Delta**	**UT**	**258.30**	**198.2**	**259.0**	**-0.70**
	Of note: Licensed coordinates of KMGR.						
KID-FM	LIC 241C	Idaho Falls	ID	219.66	322.3	220.0	-0.34
AD239	**PRO 239C3**	**Ballard**	**UT**	**188.37**	**151.6**	**163.0**	**25.37**
	Of note: Proposed facility for use by KFMR once it is deleted at Marbleton, WY.						
KYFOFM	LIC 238C1	Ogden	UT	128.80	233.4	94.0	34.80

Exhibit E, Figure 11